

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

April 11, 2017

The Honorable Sarah Netburn, U.S. Magistrate Judge
United States District Court for the S.D.N.Y.
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)
All cases

Dear Judge Netburn:

The Plaintiffs' Executive Committees write to request the opportunity to file amended proposals of the short forms suggested with our letter of April 5, 2017. With our April 5 letter, we proposed a "Notice to Conform to Consolidated Amended Complaint" and "Short Form Complaint." After we offered that submission for the Court's consideration, counsel for plaintiffs in cases that have not yet been filed reached out to us with concerns about the proposal and asked that we consider making revisions to the proposal. Because we believe the concerns voiced are issues that should be considered, we are asking for the court's permission to offer amended proposals for the Court's consideration. We anticipate submitting supplemental proposals for the Court to consider by Friday, April 14, 2017.

Respectfully,

/s/ Robert T. Haeefe
ROBERT T. HAEFELE
PLAINTIFFS' EXECUTIVE COMMITTEES

cc: Hon. George B. Daniels – via ECF
All Counsel – via ECF